

## Internal Letter



Rockwell International

Date . November 11, 1987

No. . DB 33.67

TO (Name, Organization, Internal Address)  
- B. Greer  
- Waste Operations  
- Bldg.776

FROM (Name, Organization, Internal Address, Phone)  
- N. M. Daugherty  
- Environmental Management  
- Bldg. T452B  
- 7005

SUBJECT- THE CHANGE OF THE POHC(S) FOR THE FBI TRIAL BURN

In our recent conversations you have indicated that a change will be made by Waste Operations in the waste feed mix to be used in the Fluidized Bed Incinerator Trial Burn. The change results from a desire to include a source of fluoride and a Principal Organic Hazardous Constituent (POHC) from the draft revised Environmental Protection Agency (EPA) "Hazardous Organic Thermal Stability Ranking" list developed by the University of Dayton Research Institute. This draft was obtained from EPA Region VIII. This draft list is now only proposed for use in determining the appropriate POHC to use in incinerator Trial Burns, although this revision may be currently utilized by some EPA regions. I understand that Nat Muillo, of EPA Region VIII, has indicated that he would like to see this revised list considered in determining the POHC(s) to be used for the Fluidized Bed Incinerator Trial Burn. You have also indicated that a commitment has been made to the Congressman Skaggs' Review Committee to include a fluoride source in the waste feed so that the potential for formation of gaseous plutonium and uranium fluoride compounds may be assessed.

You have indicated that, as a result of these considerations, the following chemical mixes will be used in the Trial Burn waste feeds:

Run #1	Carbon tetrachloride only
Run #2	Trichloroethylene only
Run #3-6	Carbon tetrachloride, trichloroethylene, and freon

The inclusion of plutonium and uranium will remain as previously planned.

Los Alamos Technical Associates (LATA) has estimated that the above changes will add approximately four weeks to the scheduled dates for receipt of the second draft and the final version of the Trial Burn Environmental Assessment (EA). The final EA would be delivered to Rockwell International about February 12, 1988, rather the January 15, as originally scheduled. As we have discussed, no changes will be made for the first draft, due the end of November, because of the lack of time for LATA to incorporate the changes in this draft. Work on the changes will begin shortly and proceed during the review of the first draft, for incorporation into the second draft.



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Please include these schedule changes in your schedule considerations and advise appropriate Rockwell and DOE Management of the EA schedule impact. I will prepare a revised Statement of Work for the Fluidized Bed Incinerator Trial Burn Environmental Assessment to reflect the changes. Should any further changes in the Trial Burn protocol arise, please advise me as soon as possible.

*Nancy M Daugherty*

Nancy M. Daugherty  
Environmental Management

cc:

M. E. Levin  
E. R. Naimon  
G. L. Potter  
G. H. Setlock  
W. F. Weston